REMARKS

This is intended as a full and complete response to the Final Office Action dated July 25, 2005, having a shortened statutory period for response set to expire on October 25 2005. Applicant submits this response to place the application in condition for allowance or in better form for appeal. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1-3, 5, 7-14, 16 and 18-22 are pending in the application and remain pending following entry of this response.

Claim Rejections - 35 U.S.C. § 103

Claims 1-3, 5, 7-14, 16, 18-22 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Merrill et al.* (hereinafter *Merrill*), U.S. Publication 2002/0008703. Applicant respectfully traverses the rejection.

In rejecting independent claims 1, 8, 12, and 18, the Examiner cites a number of disconnected passages from *Merrill* that ultimately fail to disclose the limitations recited the present claims. Applicant believes that the rejection confuses methods for playing an animation sequence (as disclosed by Merrill), including methods for configuring a web page or other application to play an animation sequence, with operations for composing or creating the animation sequence.

For example, the Examiner asserts that "Merrill discloses detecting that a statement contains an operation identifier, pattern-matching criteria, and attribute identifier ... (pp. 13, Para 168-169; pp. 19, Para 324-327." *See Final Office Action* p. 2. However, the first passage is directed to an example of a "special type of tag called a bookmark tag in Speak method statement [sic] to sync its operations with the output text. Immediately prior to the recited passage, *Merrill*, provides a general description of these tags:

> The server also embeds what are referred to as tags in every piece of text that is passed to the speech synthesis engine. These tags are inserted before every word in the text and tell the speech synthesis engine that the server wants to be notified whenever one of the tags is encountered. The server can then use this data to display the word that is currently being spoken in a visual user interface. This technique can then be used effectively to close caption the text as it is being spoken. In this implementation the server displays this text in a graphic representing a balloon.

Merrill, ¶ 167. Candidly, there is nothing in the passage cited by the examiner regarding pattern matching criteria or an identifier that is associated with a collection of graphical components. The passage is directed to special tags embedded in a block of text fed to a text-to-speech generator. Further, the second passage cited by the Examiner, merely provides exemplary syntax of Microsoft's Visual Basic product. Nothing in this second passage teaches a statement that contains pattern matching criteria; rather, it provides some simple examples of Visual Basic. Accordingly, Applicant submits that Merrill fails to teach or suggest detecting that a statement contains an operation identifier that specifies said operation and pattern matching criteria used to identify the set of graphical components element, as recited in Claims 1 and 12. Similarly, regarding claims 8 and 18, *Merrill* fails to teach or suggest detecting that a statement contains an operation identifier that specifies said operation, and an identifier that is associated with a collection of graphical components.

Compounding this mischaracterization of *Merrill*, the Examiner goes on to assert that *Merrill* discloses "executing the statement by identifying said set of graphical components associated with identifiers that satisfy pattern matching criteria. (pp. 20, Para 340)." *See Final Office Action*, p. 2. Not surprisingly, as *Merrill* fails to teach or suggest a method for executing an operation on a set of graphical components that includes detecting a statement that contains, among other elements, pattern matching criteria, *Merrill* also fails to teach or suggest identifying the set of graphical components that satisfy the pattern matching criteria, as recited by claims 1 and 12. Similarly, *Merrill* also fails to teach or suggest identifying member graphical components of said collection of graphical components as recited by claims 8 and 18. The text cited by the Examiner regarding these limitations provides:

> As the browser renders the Web page, it also encounters the script. For Visual Basic Script, the browser loads a Visual Basic Script runtime interpreter locally to translate the Visual Basic script on-the-fly and run the code. If the browser supports other scripting languages, it loads the appropriate interpreter based on the script language identified in the document. When the browser encounters script code, it loads an appropriate interpreter for the script language, and this interpreter then translates the code. The script code executes via calls from the interpreter in response to references to the character control interface, which in this specific implementation is the OLE control interface described in detail above. In the specific case of Visual Basic Script, for example, the browser loads an interpreter in the process space of the browser. To execute the script code, the browser uses the interpreter to translate the code and then accesses the OLE control interface in response to references to the control interface in the script

> code. As noted above, the browser loads the OLE control representing the character into the process space of the browser when it encounters an object identifier called the object tag. Thus, in this particular implementation, both the control and the interpreter are loaded in the process space of the browser. When the script code references the character control, the browser accesses the animation server, which runs in a separate process, through the control interface. The control acts a gateway, routing requests for access to the animation server's methods and properties for a particular character to the animation server.

Merrill, ¶ 340. Nothing in this passage teaches or suggests identifying a set of graphical components that satisfy a pattern matching criteria or identifying member graphical components of said collection of graphical components. Rather, the passage is directed to a method for processing a script included in the source of an HTML based webpage. When the browser encounters a tag indicating the beginning of a script, the contents of the script are provided to an appropriate process that can perform the sequence of instructions defined for the script. In the embodiment of an animation display system described by this passage, the script interpreter is managed using Object Linking and Embedding (OLE). As is known by those of ordinary skill in the art OLE s a distributed object system and protocol developed by Microsoft Corp. OLE allows one application (in this case a web browser) to "farm out" part of a document (in this case the animation script) to another editor (in this case the animation system disclosed by Merrill) and then re-import it. The recited elements of identifying a set of graphical components, either using pattern matching criteria, or an identifier, is simply not addressed.

Finally, as *Merrill* fails to teach or suggest the previous two elements, it further fails to teach or suggest the limitation of "performing said operation on said attribute of each graphical component in sad set of graphical components that satisfy said pattern matching criteria."

That *Merrill* fails to teach or suggest Applicant's claims should not be surprising as they are directed to solving different problems and each employs a different solution to achieve a different result. Specifically, *Merrill* provides "An animation system [that] provides synchronization services to synchronize actions of two more interactive user interface characters that are displayed simultaneously." *Merrill*, Abstract. Whereas Applicant's claims recite limitations directed to techniques to generate a frame within an animation. Accordingly, for all the foregoing reasons, Applicant submits that *Merrill* fails to teach or suggest the limitations recited in independent claims 1, 8, 12, and 18, Applicant believes that claims 1-3, 5, 7-14, 16 and 18-22 are in condition for allowance, and respectfully request that the rejections be withdrawn.

Conclusion

Based on the above remarks, Applicant believes that he has overcome all of the rejections set forth in the Final Office Action mailed July 25, 2005 and that the pending claims are in condition for allowance. If the Examiner has any questions, please contact the Applicant's undersigned representative at the number provided below.

Respectfully submitted,

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